

SHER TREMONTE LLP

October 12, 2022

VIA ECF

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

*So ordered
10-13-22
A.D.K. Hellerstein*

Re: *United States v. Jona Rechnitz*, 16 Cr. 389 (AKH)

Dear Judge Hellerstein:

We write on behalf of our client, Jona Rechnitz, to respectfully request that the Court authorize Mr. Rechnitz to travel to Dubai on business between November 7 and November 17, 2022. The Court previously approved travel to Dubai on several occasions. Dkt. ## 168, 170. In addition, Mr. Rechnitz recently returned from business travel to Japan, as described the Court in our previous travel request. The business venture in Japan was successful, and as a result, Mr. Rechnitz was able to make a significant payment to COBA (notwithstanding his pending appeal of the restitution order), which has been wired to our trust account and which we are in the process of delivering to COBA. Mr. Rechnitz's travel has generally been beneficial in allowing him to rebuild his life and financial stability since his cooperation in this matter. He expects that this will be his last trip to Dubai for the foreseeable future and, if successful, may put him in a position to make a further payment to COBA.

We have spoken with the government and Pretrial Services about the proposed travel and both consent to the request.

Respectfully submitted,

/s/
Michael Tremonte
Noam Biale

Attorneys for Jona Rechnitz

cc: All counsel (via ECF)